

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CAROL S. MARCELLIN, individually, and as
Co-Administrator of the Estate of Charles E.
Hollowell, deceased, and JESSICA
HOLLOWELL-McKAY, as Co-Administrator of
the Estate of Charles E. Hollowell, deceased,

Plaintiffs,

v.

HP, INC., and STAPLES, INC.,

Defendants.

Civ. No. 1:21-cv-00704-JLS

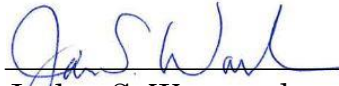
NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Jaclyn S. Wanemaker, Esq., dated September 7, 2023, the exhibits attached thereto, the accompanying memorandum of law, and upon the pleadings and proceedings had herein, the undersigned will move this Court on a date to be set by the Court or as soon thereafter as counsel can be heard, before the Hon. H. Kenneth Schroeder, Jr. at the United States District Court for the Western District of New York for an Order pursuant to Rule 37 of the Fed. R. Civ. P for (1) compelling plaintiffs to provide complete responses to HP's Interrogatories; (2) compelling plaintiffs to provide complete responses to HP's Requests for Production; (3) compelling plaintiffs to pay

HP's reasonable expenses, including attorneys' fees incurred for this motion; and (4) for such and other relief as to this Court seems just and proper.

Dated: September 7, 2023

SMITH, SOVIK, KENDRICK & SUGNET, P.C.



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